# Exhibit B

	"Bu	_		of repose period based o				
Case No.	Plaintiffs' Last Name	Plaintiffs' First Name	State of Surgery	Date of Surgery	Date of Case Filing	Plaintiffs' Counsel's Firm	Plaintiffs' Response to Dates	Plaintiffs Response to Application of SOR
0:16-cv-02088-JNE-DTS	Duncan	William	Tennessee	6/16/2010	6/23/2016	Skikos Crawford Skikos & Joseph	Agree with dates 3M listed.	Less than 10 years between index and filing. Tennessee – 6/10 years T.C.A. § 29-28-103Plaintiffs note their agreement to using 10 year SOR for purposes of this exercise is predicated in part on Defendants' representation that the relevant index surgery will be the triggering event for Tennessee.
0:16-cv-02125-JNE-DTS	Milam	Jeffie	Tennessee	4/1/2009	6/24/2016	Kennedy Hodges, LLP	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:16-cv-02155-JNE-DTS	Davis	Patricia L.	Tennessee	2/23/2007	6/24/2016	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:16-cv-02298-JNE-DTS	Dandrea	Mario	Tennessee	2/23/2010	7/1/2016	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:16-cv-02386-JNE-DTS	Hall	Claudia J.	Tennessee	7/9/2009	7/11/2016	Miller Firm LLC	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:16-cv-02428-JNE-DTS	King Jr	Walter H	Tennessee	6/23/2008	7/15/2016	Kennedy Hodges	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:16-cv-02460-JNE-DTS	Scruggs	Jimmy L.	Tennessee	4/9/2010	7/19/2016	Lockridge, Grindal		Less than 10 years between index and filing.
0:16-cv-02486-JNE-DTS	Canup	Lois A.	Tennessee	2/26/2009	7/21/2016	Kennedy Hodges	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:16-cv-02911-JNE-DTS	Snider	Janice	Tennessee	4/26/2010	8/29/2016	Gustafson Gluek	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:17-cv-00427-JNE-DTS	Roysdon	Windle R.	Tennessee	8/19/2010	2/8/2017	Murray Law Firm	Sugject surgery was a revision performed on 11/11/11.	Less than 10 years between index and filing.
0:17-cv-00465-JNE-DTS	Varner	Stephen E.	Tennessee	9/8/2008	9/29/2016	Brown & Crouppen	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:17-cv-00616-JNE-DTS	Brown	Alfred	Tennessee	12/10/2009	2/27/2017	Brown & Crouppen	Agree with dates 3M listed.	Less than 10 years between index and filing.
0:17-cv-01184-JNE-DTS	Enz	Martha	Illinois	7/21/2006	4/17/2017	Brown & Crouppen	Agree with dates 3M listed.	SOR unconstitional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (III. 1997)

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 3 of 20

0:17-cv-01516-JNE-DTS	Lawson	Albert	Illinois	11/11/2004	5/9/2017	Brown & Crouppen		SOR unconstitional in
					' '			products liability actions.
								See Best v. Taylor Mach.
								Works., 689 N.E.2d 1057 (III.
							Agree with dates 3M listed.	1997)
0:17-cv-01617-JNE-DTS	Pilger	Catherine	Illinois	8/31/2004	5/16/2017	Brown & Crouppen		SOR unconstitional in
								products liability actions.
								See Best v. Taylor Mach.
								Works., 689 N.E.2d 1057 (III.
							Agree with dates 3M listed.	1997)
0:17-cv-01737-JNE-DTS	Peacock, Jr.	Claude	Ohio	9/22/2006	5/24/2017	Brown & Crouppen		Ohio – 10 years
								O.R.C. § 2305.10(C)(1).
								Should use 12 years, instead
								of 10 years, to avoid this
								exception in the SOR
								statute. "However, if the
								cause of action accrues in
								years 9 or 10, the action may
								be commenced within 2
								years after the action
							Agree with dates 3M listed.	accrues."
0:17-cv-02058-JNE-DTS	Balbach	William	Georgia	1/24/2007	6/14/2017	Pendley, Baudin		
								Negligent failure to warn is a
								recgonized exemption to the
								Georgia SOR; as is willful
								negligence, which Mr.
								Balback has asserted against
								3M. Georgia – 10 years
								O.C.G.A. § 51-1-11(b)(2)
								Should not be included, as
								this SOR expressly does not
								affect failure to warn claims.
								Given all Georgia cases have
								asserted failure to warn,
								using the SOR to dispose of
								some claims would never
								dispose of an entire case in
								the MDL, Plaintiffs
								respectfully submit it is
							205 11 1	inappropriate to use an SOR
							Agree with dates 3M listed.	in Georgia for this exercise.

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 4 of 20

0:17-cv-02270-JNE-DTS	Clinkenbeard	Philip	Kansas	7/11/2006	6/26/2017	Brown & Crouppen		Kansas – 10 years, K.S.A. 60- 513, Statute of repose does not apply to latent harms, which would include
								infections from the use of a
0.47 02200 INF DTC	611	D. I I	-	2/4/2005	6/27/2047	D	Agree with dates 3M listed.	Bair Hugger device.
0:17-cv-02309-JNE-DTS	Smith	Barbara J.	Tennessee	3/1/2005	6/27/2017	Brown & Crouppen		Less than 10 years between index and filing. Tennessee – 6/10 years T.C.A. § 29-28-103Plaintiffs note their agreement to using 10 year SOR for purposes of this exercise is predicated in part on Defendants' representation that the relevant index surgery will be the triggering
							Agree with dates 3M listed.	event for Tennessee.
0:17-cv-02386-JNE-DTS	Krippendorf	Donald	Tennessee	4/13/2011	6/29/2017	Brown & Crouppen	Agree with dates 3M listed.	Less than 10 years between index and filing. Tennessee – 6/10 years T.C.A. § 29-28-103Plaintiffs note their agreement to using 10 year SOR for purposes of this exercise is predicated in part on Defendants' representation that the relevant index surgery will be the triggering event for Tennessee.
0:17-cv-02416-JNE-DTS	Davis	Betty	Illinois	5/23/2005	6/30/2017	Brown & Crouppen	Agree with dates 3M listed.	SOR unconstitional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (III. 1997)

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 5 of 20

0:17-cv-02490-JNE-DTS	DaMausia	Nancy A.	Indiana	2/7/2007	7/5/2017	Brown & Crouppen		Indiana – 10 years, I.C. § 34-
0:17-CV-02490-JNE-D13	DeMougin	Nancy A.	Indiana	2///2007	//5/201/	Brown & Crouppen		20-3-1, Should use 12 years,
								instead of 10 years, to avoid
								this exception in the SOR
								statute. "However, if the
								cause of action accrues in
								years 9 or 10, the action may
								be commenced within 2
								years after the action
							Agree with dates 3M listed.	accrues."
0:17-cv-02560-JNE-DTS	Zuniga	Vicente	Ohio	8/13/2004	7/6/2017	Brown & Crouppen		Ohio – 10 years, O.R.C. §
								2305.10(C)(1) Should use 12
								years, instead of 10 years, to
								avoid this exception in the
								SOR statute. "However, if
								the cause of action accrues
								in years 9 or 10, the action
								may be commenced within 2
								years after the action
							Agree with dates 3M listed.	accrues."
0:17-cv-02603-JNE-DTS	Frantz	William R	Kansas	9/19/2005	7/7/2017	Brown & Crouppen		Kansas – 10 years, K.S.A. 60-
	1			, -5, -555	1,7,7===:			513, Statute of repose does
								not apply to latent harms,
								which would include
								infections from the use of a
							Case was filed 12/23/2016	Bair Hugger device.
0:17-cv-02633-JNE-DTS	Davis	Kenneth	Indiana	11/7/2005	7/7/2017	Kennedy Hodges	Case was filed 12/23/2010	Indiana – 10 years, I.C. § 34-
0.17-CV-02033-3NE-D13	Davis	Kenneur	Illularia	11/7/2003	////201/	Kermedy Houges		20-3-1, Should use 12 years,
								instead of 10 years, to avoid
								this exception in the SOR
								statute. "However, if the
								cause of action accrues in
								years 9 or 10, the action may
								be commenced within 2
								years after the action
							Agree with dates 3M listed.	accrues."
0:17-cv-02634-JNE-DTS	Harris	Wanda	Kansas	3/28/2005	7/7/2017	Brown & Crouppen		Kansas – 10 years, K.S.A. 60-
								513, Statute of repose does
								not apply to latent harms,
								which would include
								infections from the use of a
							Agree with dates 3M listed.	Bair Hugger device.

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 6 of 20

0:47 -:: 02C0F INF DTC	Daniele Co	Taka H	V	3/9/2007	7/10/2017	D 9 C		Kansas – 10 years, K.S.A. 60-
0:17-cv-02685-JNE-DTS	Daniels Sr	John H	Kansas	3/9/2007	7/10/2017	Brown & Crouppen		
								513, Statute of repose does
								not apply to latent harms,
								which would include
							Subject 2/20/07	infections from the use of a
0.47 02722 INF DTC	VACIDA	D.	No. 11. Complete	4 /4 /2004	7/44/2047		Subject surgery was 3/28/07	Bair Hugger device.
0:17-cv-02733-JNE-DTS	Wilkins	Roy	North Carolina	1/1/2004	7/11/2017	Brown & Crouppen		North Carolina – 6 years (if
								accrual before 10/1/09);
								12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-
								46.1, Plaintiffs note their
								agreement to the 12 year
								SOR for purposes of this
								exercise is predicated in part on Defendants'
								representation the 'date of
								initial purchase' will be any
							Subject surgery was 6/23/2009;	given plaintiff's index
							case was filed 12/23/2016	surgery.
0:17-cv-02760-JNE-DTS	Green	Irma	Georgia	7/18/2005	7/11/2017	The Olinde Firm, LLC	case was filed 12/23/2010	Surgery.
0.17-CV-02700-3NE-D13	Green	IIIIIa	Georgia	7/18/2003	//11/201/	The Ollide Fifth, LLC		Georgia – 10 years, O.C.G.A.
								§ 51-1-11(b)(2), Should not
								be included, as this SOR
								expressly does not affect
								failure to warn claims. Given
								all Georgia cases have
								asserted failure to warn,
								using the SOR to dispose of
								some claims would never
								dispose of an entire case in
								the MDL, Plaintiffs
								respectfully submit it is
								inappropriate to use an SOR
							Agree with dates 3M listed.	in Georgia for this exercise.
0:17-cv-02792-JNE-DTS	Sons	Mary	Indiana	12/28/2005	7/12/2017	Brown & Crouppen	0	Indiana – 10 years, I.C. § 34-
		<i>'</i>		' '	, ,			20-3-1, Should use 12 years,
								instead of 10 years, to avoid
								this exception in the SOR
								statute. "However, if the
								cause of action accrues in
								years 9 or 10, the action may
								be commenced within 2
								years after the action
							Agree with dates 3M listed.	accrues."
L	1	1	1	1	1	1	5 111111 1111	

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 7 of 20

0:17-cv-02827-JNE-DTS	Hamilton	Danny	Ohio	3/11/2005	7/12/2017	Kennedy Hodges, L.L.P.		Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. "However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action
0:17-cv-02828-JNE-DTS	Wilson	Tom	Indiana	8/24/2005	7/12/2017	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.  Agree with dates 3M listed.	accrues."  Indiana – 10 years, I.C. § 34- 20-3-1, Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. "However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues."
0:17-cv-02845-JNE-DTS	Weeks	Sheryl	Kansas	4/11/2007	7/13/2017	Brown & Crouppen	Agree with dates 3M listed.	Kansas – 10 years, K.S.A. 60- 513, Statute of repose does not apply to latent harms, which would include infections from the use of a Bair Hugger device.
0:17-cv-02846-JNE-DTS	Task	William	Kansas	1/10/2006	7/13/2017	Brown & Crouppen	agree with dates 3M listed.	Kansas – 10 years, K.S.A. 60- 513, Statute of repose does not apply to latent harms, which would include infections from the use of a Bair Hugger device.
0:17-cv-02942-JNE-DTS	Нагр	John W	Kansas	11/17/2003	7/14/2017	Brown & Crouppen	Agree with dates 3M listed.	Kansas – 10 years, K.S.A. 60- 513, Statute of repose does not apply to latent harms, which would include infections from the use of a Bair Hugger device.

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 8 of 20

						_		
0:17-cv-02950-JNE-DTS	Hipp	Donald	Ohio	1/1/2004	7/14/2017	Kennedy Hodges, L.L.P.		Ohio – 10 years, O.R.C. §
								2305.10(C)(1) Should use 12
								years, instead of 10 years, to
								avoid this exception in the
								SOR statute. "However, if
								the cause of action accrues
								in years 9 or 10, the action
								may be commenced within 2
								years after the action
							Date of surgery should be 7/9/04	accrues."
0:17-cv-02970-JNE-DTS	Moore	Howard	North Carolina	1/1/2006	7/16/2017	Brown & Crouppen	Date of surgery should be 175704	North Carolina – 6 years (if
0.17 00 02370 3102 313	I VIOOTE	110Wara	Troitir curonna	1,1,2000	771072017	brown a croappen		accrual before 10/1/09);
								12 years (if accrual after
								10/1/09), N.C. Gen. Stat. § 1-
								46.1, Plaintiffs note their
								agreement to the 12 year
								SOR for purposes of this
								exercise is predicated in part
								on Defendants'
								representation the 'date of
								initial purchase' will be any
							10/9/2006; case was filed	given plaintiff's index
								surgery.
0:17-cv-02984-JNE-DTS	Campbell	Kenneth	North Carolina	12/6/2005	7/17/2017	Brown & Crouppen		North Carolina – 6 years (if
	·							accrual before 10/1/09);
								12 years (if accrual after
								10/1/09), N.C. Gen. Stat. § 1-
								46.1, Plaintiffs note their
								agreement to the 12 year
								SOR for purposes of this
								exercise is predicated in part
								on Defendants'
								representation the 'date of
								initial purchase' will be any
								given plaintiff's index
								surgery.
0:17-cv-02992-JNE-DTS	Luttrell	Ricky E.	Ohio	10/11/2006	7/17/2017	Kennedy Hodges, L.L.P.		Ohio – 10 years, O.R.C. §
								2305.10(C)(1) Should use 12
								years, instead of 10 years, to
								avoid this exception in the
								SOR statute. "However, if
								the cause of action accrues
								in years 9 or 10, the action
								may be commenced within 2
								years after the action
							Agree with dates 3M listed.	accrues."
		1			1		Agree with dates sivi listed.	acciues.

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 9 of 20

0:17-cv-02996-JNE-DTS	Thompson	Billie	Ohio	8/3/2005	7/17/2017	Kennedy Hodges	Agree with dates 3M listed.	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. "However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues."
0:17-cv-03117-JNE-DTS	Henry	Theodore L	Illinois	2/12/2007	7/19/2017	Brown & Crouppen	Case was filed 12/13/2016	SOR unconstitional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (III. 1997)
0:17-cv-03214-JNE-DTS	Johnson	Darline M	Illinois	6/16/2005	7/21/2017	Brown & Crouppen	Case was filed 12/13/2016	SOR unconstitional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (III. 1997)
0:17-cv-03314-JNE-DTS	Johnson	Darren V.	Georgia	1/23/2006	7/25/2017	Kennedy Hodges	Agree with dates 3M listed.	Georgia – 10 years, O.C.G.A. § 51-1-11(b)(2), Should not be included, as this SOR expressly does not affect failure to warn claims. Given all Georgia cases have asserted failure to warn, using the SOR to dispose of some claims would never dispose of an entire case in the MDL, Plaintiffs respectfully submit it is inappropriate to use an SOR in Georgia for this exercise.

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 10 of 20

0.17 at 02412 INF DTS	Ougsinhorm	Coroldino	Coordia	7/19/2005	7/27/2017	Kannady Hadges L.L.D.		
0:17-cv-03412-JNE-DTS	Quesinberry	Geraldine	Georgia	7/19/2005	//2//2017	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	Georgia – 10 years, O.C.G.A. § 51-1-11(b)(2), Should not be included, as this SOR expressly does not affect failure to warn claims. Given all Georgia cases have asserted failure to warn, using the SOR to dispose of some claims would never dispose of an entire case in the MDL, Plaintiffs respectfully submit it is inappropriate to use an SOR in Georgia for this exercise.
0:17-cv-03646-JNE-DTS	Benjamin	John R.	Georgia	11/13/2006	8/9/2017	Kennedy Hodges	Agree with dates 3M listed.	Georgia – 10 years, O.C.G.A. § 51-1-11(b)(2), Should not be included, as this SOR expressly does not affect failure to warn claims. Given all Georgia cases have asserted failure to warn, using the SOR to dispose of some claims would never dispose of an entire case in the MDL, Plaintiffs respectfully submit it is inappropriate to use an SOR in Georgia for this exercise.
0:17-cv-03993-JNE-DTS	Hughes	Clifford	Illinois	4/7/2006	8/28/2017	Brown & Crouppen	Agree with dates 3M listed.	SOR unconstitional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (III. 1997)
0:17-cv-04014-JNE-DTS	Haynes	Josephine	Ohio	5/24/2007	8/29/2017	Brown & Crouppen	Agree with dates 3M listed.	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. "However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues."

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 11 of 20

0:17-cv-04088-JNE-DTS	Harris	Lawrence	Ohio	6/18/2007	8/31/2017	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. "However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues."
0:17-cv-04104-JNE-DTS	Trice	Johnny	Ohio	4/1/2004	9/1/2017	Kennedy Hodges		Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. "However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action
0:17-cv-04162-JNE-DTS	Harrington	Elizabeth	Connecticut	7/20/2004	9/7/2017	Brown & Crouppen	Agree with dates 3M listed.	accrues." Plaintiff in the process of
0.17-CV-04162-JINE-D13	narrington	Elizabetii	Connecticut	7/20/2004	9/7/2017		Subject surgery was 12/6/2005	trying to dismiss this case.
0:17-cv-04231-JNE-DTS	Elbert	Diane	Indiana	8/2/2006	9/13/2017		Agree with dates 3M listed.	Indiana – 10 years, I.C. § 34- 20-3-1, Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. "However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues."
0:17-cv-04252-JNE-DTS	Kenny	Charles	Illinois	7/19/2007	9/14/2017	Brown & Crouppen	Agree with dates 3M listed.	SOR unconstitional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (III. 1997)

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 12 of 20

0:17-cv-04302-JNE-DTS	Tilley	William	North Carolina	2/23/2005	9/19/2017	The Olinde Firm, LLC		North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants' representation the 'date of initial purchase' will be any given plaintiff's index
							Agree with dates 3M listed.	surgery.
0:17-cv-04313-JNE-DTS	Janet L.	McNease	Tennessee	8/22/2011	9/19/2017	Kirtland Packard	agree with dates 3M listed.	Less than 10 years between index and filing.
0:17-cv-04394-JNE-DTS	Bigsby-Fritz	Debra	Tennessee	3/10/2011	9/26/2017	Skikos Crawford	agree with dates sivi listed.	Less than 10 years between
0.17 07 04354 3112 213	D18307 11112	Besid	remessee	3/10/2011	3/20/2017	Skikos erawiera	Agree with dates 3M listed.	index and filing.
0:17-cv-04413-JNE-DTS	Kasson	Julie	Kansas	3/19/2007	9/27/2017	Brown & Crouppen		Kansas – 10 years, K.S.A. 60- 513, Statute of repose does not apply to latent harms, which would include infections from the use of a
							Agree with dates 3M listed.	Bair Hugger device.
0:17-cv-04469-JNE-DTS	Swanson	Colleen	Illinois	4/10/2007	9/28/2017	Seth Webb	Agree with dates 3M listed.	SOR unconstitional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (III. 1997)
0:17-cv-04484-JNE-DTS	White	Bessie L.	Illinois	7/14/2005	9/29/2017	Davis Crump	Agree with dates 3W listed.	SOR unconstitional in
						·	Agree with dates 3M listed.	products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (III. 1997)
0:17-cv-04653-JNE-DTS	Pepke	Russell	Ohio	8/29/2006	10/12/2017	Kennedy Hodges	Agree with dates 3M listed.	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. "However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues."

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 13 of 20

0:17-cv-04733-JNE-DTS	Gardner	Vinna M.	Ohio	12/1/2005	10/19/2017	Brown & Crouppen		Ohio – 10 years, O.R.C. §
	0.000	1		, -,	,,			2305.10(C)(1) Should use 12
								years, instead of 10 years, to
								avoid this exception in the
								SOR statute. "However, if
								the cause of action accrues
								in years 9 or 10, the action
								may be commenced within 2
								years after the action
							Subject surgery was 12/20/2005	accrues."
0:17-cv-04750-JNE-DTS	Babb	Douglas	Georgia	7/5/2006	10/20/2017	Davis Crump		Georgia – 10 years, O.C.G.A.
								§ 51-1-11(b)(2), Should not
								be included, as this SOR
								expressly does not affect
								failure to warn claims. Given
								all Georgia cases have
								asserted failure to warn,
								The state of the s
								using the SOR to dispose of
								some claims would never
								dispose of an entire case in
								the MDL, Plaintiffs
								respectfully submit it is
								inappropriate to use an SOR
							Agree with dates 3M listed.	in Georgia for this exercise.
0:17-cv-04845-JNE-DTS	Murray	Danny	Tennessee	7/15/2011	10/25/2017	Kirtland Packard		Less than 10 years between
							Agree with dates 3M listed.	index and filing.
0:17-cv-04904-JNE-DTS	Luketich	Richard	Illinois	1/10/2007	10/27/2017	Kennedy Hodges, L.L.P.		SOR unconstitional in
								products liability actions.
								See Best v. Taylor Mach.
								Works., 689 N.E.2d 1057 (III.
							Agree with dates 3M listed.	1997)
0:17-cv-04999-JNE-DTS	Carpenter	Willie	Tennessee	7/31/2008	11/2/2017	Kennedy Hodges, L.L.P.		Less than 10 years between
							Agree with dates 3M listed.	index and filing.

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 14 of 20

0:17-cv-05381-JNE-DTS         Bentson         Gary R.         Georgia         3/9/2005         12/7/2017         Kennedy Hodges           0:17-cv-05497-JNE-DTS         Conner         Marty         Ohio         5/30/2007         12/20/2017         Davis Crump, P.C           0:17-cv-05531-JNE-DTS         Morris         Larry         Kansas         7/27/2007         12/21/2017         Kennedy Hodges	Georgia – 10 years, O.C.G.A. § 51-1-11(b)(2), Should not be included, as this SOR
	expressly does not affect failure to warn claims. Given all Georgia cases have asserted failure to warn, using the SOR to dispose of some claims would never dispose of an entire case in the MDL, Plaintiffs respectfully submit it is inappropriate to use an SOR in Georgia for this exercise.
0:17-cv-05531-INF-DTS Morris Larry Kansas 7/27/2007 12/21/2017 Kennedy Hodges	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. "However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action
0:17-cv-05531-INF-DTS Morris Larry Kansas 7/27/2007 12/21/2017 Kennedy Hodges	Agree with dates 3M listed. accrues."
	Kansas – 10 years, K.S.A. 60- 513, Statute of repose does not apply to latent harms, which would include infections from the use of a
	Agree with dates 3M listed. Bair Hugger device.
0:18-cv-00049-JNE-DTS Rommer Robert Georgia 11/12/2007 1/5/2018 Kennedy Hodges	Georgia – 10 years, O.C.G.A. § 51-1-11(b)(2), Should not be included, as this SOR expressly does not affect failure to warn claims. Given all Georgia cases have asserted failure to warn, using the SOR to dispose of some claims would never dispose of an entire case in the MDL, Plaintiffs respectfully submit it is inappropriate to use an SOR in Georgia for this exercise.

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 15 of 20

0:18-cv-00093-JNE-DTS	Ashley	Gearold Ruth	Ohio	7/18/2005	1/12/2018	Bernstein Liebhard LLP	agree with dates 3M listed.	Ohio – 10 years, O.R.C. § 2305.10(C)(1) Should use 12 years, instead of 10 years, to avoid this exception in the SOR statute. "However, if the cause of action accrues in years 9 or 10, the action may be commenced within 2 years after the action accrues."
0:18-cv-00151-JNE-DTS	Russell	Janice	Illinois	2/15/2005	1/22/2018	Bernstein Liebhard LLP	Agree with dates 3M listed.	SOR unconstitional in products liability actions. See Best v. Taylor Mach. Works., 689 N.E.2d 1057 (III. 1997)
0:18-cv-01117-JNE-DTS	Tisdale	Ruth B.	North Carolina	5/6/2002	4/25/2018	Justinian & Associates		North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants' representation the 'date of initial purchase' will be any given plaintiff's index
0:18-cv-01614-JNE-DTS	Fitton	Irma	North Carolina	9/27/2007	6/9/2018	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.  Agree with dates 3M listed.	surgery.  North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants' representation the 'date of initial purchase' will be any given plaintiff's index surgery.

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 16 of 20

0:18-cv-01774-JNE-DTS	Carpenter	Daisy	North Carolina	6/8/2009	6/28/2018	Brown & Crouppen	BH exposure with infections following surgeries on 6/8/09 and 10/17/11	surgery.
0:18-cv-01887-JNE-DTS	Woody	Richard	North Carolina	4/10/2007	7/6/2018	Kennedy Hodges	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants' representation the 'date of initial purchase' will be any given plaintiff's index surgery.
0:18-cv-01918-JNE-DTS	Davis	Karen	North Carolina	5/5/2009	7/9/2018	Brown & Crouppen	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants' representation the 'date of initial purchase' will be any given plaintiff's index surgery.

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 17 of 20

0:18-cv-01950-JNE-DTS	Payne	Ernest	North Carolina	7/28/2009	7/12/2018	Kennedy Hodges, L.L.P.	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants' representation the 'date of initial purchase' will be any given plaintiff's index surgery.
0:18-cv-01999-JNE-DTS	Hobbins	Lisa	North Carolina	6/23/2006	7/16/2018	Kennedy Hodges, L.L.P.		North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants' representation the 'date of initial purchase' will be any given plaintiff's index
0:18-cv-02010-JNE-DT\$	Barham	Phyllis	North Carolina	3/8/2007	7/17/2018	Brown & Crouppen	Agree with dates 3M listed.  Agree with dates 3M listed.	surgery.  North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants' representation the 'date of initial purchase' will be any given plaintiff's index surgery.

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 18 of 20

0:18-cv-02118-JNE-DTS	Yelverton	Annie W.	North Carolina	1/23/2009	7/24/2018	The Miller Firm LLC	Agree with dates 3M listed.	North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants' representation the 'date of initial purchase' will be any given plaintiff's index surgery.
0:18-cv-02179-JNE-DTS	Yankovich	Brian	North Carolina	6/1/2009	7/26/2018	Kennedy Hodges		North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants' representation the 'date of initial purchase' will be any given plaintiff's index
0:18-cv-02186-JNE-DTS	Morrison	Richard	North Carolina	7/26/2005	7/26/2018	Brown & Crouppen	Agree with dates 3M listed.  Agree with dates 3M listed.	surgery.  North Carolina – 6 years (if accrual before 10/1/09); 12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-46.1, Plaintiffs note their agreement to the 12 year SOR for purposes of this exercise is predicated in part on Defendants' representation the 'date of initial purchase' will be any given plaintiff's index surgery.

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 19 of 20

				T	T			
0:18-cv-02215-JNE-DTS	Whitfield	John	North Carolina	1/13/2009	7/30/2018	Kennedy Hodges		North Carolina – 6 years (if
								accrual before 10/1/09);
								12 years (if accrual after
								10/1/09), N.C. Gen. Stat. § 1-
								46.1, Plaintiffs note their
								agreement to the 12 year
								SOR for purposes of this
								exercise is predicated in part
								on Defendants'
								representation the 'date of
								initial purchase' will be any
								given plaintiff's index
							Agree with dates 3M listed.	
2.12				2/22/22/2	0/=/0040		Agree with dates 3W listed.	surgery.
0:18-cv-02306-JNE-DTS	James	Linda	North Carolina	2/22/2005	8/7/2018	Kennedy Hodges		North Carolina – 6 years (if
								accrual before 10/1/09);
								12 years (if accrual after
								10/1/09), N.C. Gen. Stat. § 1-
								46.1, Plaintiffs note their
								agreement to the 12 year
								SOR for purposes of this
								exercise is predicated in part
								on Defendants'
								representation the 'date of
								initial purchase' will be any
								given plaintiff's index
							Agree with dates 3M listed.	surgery.
0:18-cv-02307-JNE-DTS	King	Terry	Kansas	3/11/2008	8/7/2018	Kennedy Hodges	Agree with dates sivi listed.	Kansas – 10 years, K.S.A. 60-
0.10 00 02307 3142 013	King	Terry	Kunsus	3/11/2000	0/7/2010	Refinedy flodges		513, Statute of repose does
								not apply to latent harms,
								which would include
								infections from the use of a
							Agree with dates 3M listed.	Bair Hugger device.
0:18-cv-02391-JNE-DTS	Vonville	Natalie	North Carolina	8/26/2009	8/15/2018	Kennedy Hodges, L.L.P.		North Carolina – 6 years (if
								accrual before 10/1/09);
								12 years (if accrual after
								10/1/09), N.C. Gen. Stat. § 1-
								46.1, Plaintiffs note their
								agreement to the 12 year
								SOR for purposes of this
								exercise is predicated in part
								on Defendants'
								representation the 'date of
								initial purchase' will be any
								given plaintiff's index
							Agree with dates 3M listed.	
					1		Agree with dates sivi listed.	surgery.

## CASE 0:15-md-02666-JNE-DTS Doc. 2000-2 Filed 06/26/19 Page 20 of 20

0:18-cv-02750-JNE-DTS	Hicks	Mildora	Tennessee	5/31/2012	9/25/2018	Gustafson Gluek PLLC		
								Less than 10 years between
								index and filing. Tennessee –
								6/10 years
								T.C.A. § 29-28-103Plaintiffs
								note their agreement to
								using 10 year SOR for
								purposes of this exercise is
								predicated in part on
								Defendants' representation
								that the relevant index
							Agree with dates 3M listed.	surgery will be the triggering event for Tennessee.
0:18-cv-03372-JNE-DTS	Whitaker	Melisa	Tennessee	8/22/2012	12/12/2018	Skikos Crawford Skikos & Joseph	Agree with dates sivilisted.	event for rennessee.
0.10-CV-03372-3IVE-D13	Willtakei	IVICIISA	Termessee	0/22/2012	12/12/2010	Skikos Crawford Skikos & Joseph		Less than 10 years between
								index and filing. Tennessee –
								6/10 years
								T.C.A. § 29-28-103Plaintiffs
								note their agreement to
								using 10 year SOR for
								purposes of this exercise is
								predicated in part on
								Defendants' representation
								that the relevant index
								surgery will be the triggering
0.40				7 (0.0 (0.0 0.0	10/10/2010		Agree with dates 3M listed.	event for Tennessee.
0:18-cv-03384-JNE-DTS	Hawkins	Deana	North Carolina	7/28/2008	12/12/2018	Justinian & Associates PLLC		North Carolina – 6 years (if
								accrual before 10/1/09);
								12 years (if accrual after 10/1/09), N.C. Gen. Stat. § 1-
								46.1, Plaintiffs note their
								agreement to the 12 year
								SOR for purposes of this
								exercise is predicated in part
								on Defendants'
								representation the 'date of
								initial purchase' will be any
								given plaintiff's index
							Agree with dates 3M listed.	surgery.